

REMARKS

The objections to the specification should be withdrawn

The Office has objected to the specification as failing to provide sufficient antecedent support for the claimed subject matter.

In particular, the Office takes the position that claims 25 and 26 are directed to a computer-readable medium but that the term “computer-readable medium” is not defined in the specification. The term “computer-readable medium” is well-known in the art. Further, the term is used in the specification, for example, at paragraph 0020 where the specification states: “In such a system, the remote computing platform may include a computer-readable medium containing computer-readable instructions capable of instructing the platform to receive a request for access to an information network.”

It is respectfully submitted that it would be well understood by a person of ordinary skill in the art what is meant by computer readable medium. The Applicants respectfully request withdrawal of this reason for objection.

The Office further takes the position that the term “unique” is used in the claims but there is no clear and explicit definition of the word in the specification. In particular, the Office takes the position that what may be considered unique in one context may not be unique in another context. The Office uses the example of a device in a local area network (LAN), making the point that its IP address may be unique in the local network but may not be unique. The Applicants respectfully traverse this basis for objection. Without disputing that a device in one LAN may have the same IP address as a device in another LAN, that fact alone does not mean that the term “unique” is not clear. In fact, what is meant by the term “unique” is clear and would be well understood by one skilled in the art. The term unique has to be taken in context. For example, claim 1 recites “A method of network authentication comprising... generating a unique credential for the user that comprises network specific information”. It would be clear to one skilled in the art that the credential would have to be unique in the network in which the authentication is taking place. The Applicants respectfully request withdrawal of this reason for objection.

Claims 1 and 2 are Allowable

The Office has rejected claims 1 and 2 under 35 U.S.C. § 103(a) as unpatentable over Ueshima in view of Schneider.

Claim 1 is allowable. The cited portions of Ueshima and Schneider fail to teach or suggest the specific combination of claim 1 including “receiving a common user credential from a user seeking access to an information network” and “generating a unique credential after receiving the common user credential from the user, the unique credential comprising network specific information associated with a connection of the user”, as in claim 1 (emphasis added). For example, the Office points to Ueshima at col. 10, lines 7-30 as teaching the step of receiving a common user credential stating that personal information of each user is registered in a table. However, registration of personal information does not teach or suggest receiving a common user credential. Personal information of a user cannot be equated to a common user credential. Further, even if the personal information could be equated to a common user credential, there is no teaching or suggestion of a unique credential being generated after receiving the common user credential.

The Office points to col. 3, lines 25-58 of Ueshima as teaching that a password is generated based on the user telephone number. The Office equates the password to the unique credential, as in claim 1. However, the Office does not cite to any teaching or suggestion in the combination of Ueshima and Schneider of any relationship between receiving the personal information (or even to any teaching or suggestion that it is received) and generating the password, much less the recited relationship of generating a unique credential after receiving the common user credential. There is no teaching or suggestion, shown by the Office of “generating a unique credential after receiving the common user credential from the user, the unique credential comprising network specific information associated with a connection of the user,” as in claim 1.

Thus, claim 1 is allowable.

Claim 2 is allowable, at least by virtue of its dependence from claim 1. In addition, claim 2 recites additional elements not disclosed or suggested by the cited portions of Ueshima and Schneider.

Claims 3-26 are Allowable

The Office has rejected claims 3-26 under 35 U.S.C. § 103(a) as unpatentable over Ueshima in view of Schneider and further in view of the Official Notice.

Claims 3-13 are allowable, at least by virtue of their dependence from claim 1. In addition, claims 3-13 recite additional elements not disclosed or suggested by the cited portions of Ueshima and Schneider taken together with the Official Notice.

Claim 3 is distinct from any teaching or suggestion of the cited combination. Without debating the Office's position regarding taking Official Notice that DSL is a well-known transmission technique, the Applicants respectfully disagree that there exists a motivation to use a DSL connection in place of the telephone connection of Ueshima or that such a system would even function. Simple substitution of a DSL connection in place of the telephone connection of Ueshima would lead to a non-working system. For example, part of Ueshima cited by the Office describes that the user placed a call to the CTI system. If a DSL connection was substituted for the telephone connection, it would not be possible to place a call. Claim 3 recites the connection of the user comprises a DSL connection. Claim 3 is allowable for at least this additional reason.

Claim 4 is distinct from any teaching or suggestion of the cited combination. Without debating the Office's position regarding taking Official Notice that cable transmission systems were well-known at the time of the invention, the Applicants respectfully disagree that there exists a motivation to use a cable connection in place of the telephone connection of Ueshima or that such a system would even function. Simple substitution of a cable connection in place of the telephone connection of Ueshima would lead to a non-working system. For example, part of Ueshima cited by the Office describe that the user placed a call to the CTI system. If a cable connection was substituted for the telephone connection, it would not be possible to place a call. Claim 4 recites the connection of the user comprises a link at least partially supported by a cable modem. Claim 4 is allowable for at least this additional reason.

With respect to Claim 5, the Office takes the position that Ueshima at col. 3, lines 38-41 indicates that CTI device or other device generates the password. However, claim 5 recites "The

method of claim 1, further comprising utilizing a network node to generate the unique credential.” However, the password discussed at the cited portion of Ueshima cannot be equated with the unique credential of claim 5 at least because the password of Ueshima is not generated after generating a common user credential from the user. Claim 5 is allowable for at least this additional reason.

Claim 6 is distinct from any teaching or suggestion of the cited combination. Without debating the Office’s position regarding taking Official Notice that ADSL is a well-known transmission technique, the Applicants respectfully disagree that there exists a motivation to use an ADSL connection in place of the telephone connection of Ueshima or that such a system would even function. Simple substitution of an ADSL connection in place of the telephone connection of Ueshima would lead to a non-working system. For example, part of Ueshima cited by the Office describes that the user placed a call to the CTI system. If an ADSL connection was substituted for the telephone connection, it would not be possible to place a call. Claim 6 recites the network specific information comprises a unique circuit identification number associated with an ADSL connection. Claim 6 is allowable for at least this additional reason.

Claim 7 is distinct from any teaching or suggestion of the cited combination. Without debating the Office’s position regarding taking Official Notice that ADSL is a well-known transmission technique, the Applicants respectfully disagree that there exists a motivation to use an ADSL connection in place of the telephone connection of Ueshima or that such a system would even function. Simple substitution of an ADSL connection in place of the telephone connection of Ueshima would lead to a non-working system. For example, part of Ueshima cited by the Office describes that the user placed a call to the CTI system. If an ADSL connection was substituted for the telephone connection, it would not be possible to place a call. Claim 7 recites the network specific information comprises a virtual circuit identification associated with ADSL routing. Claim 7 is allowable for at least this additional reason.

With respect to Claim 10, the Office takes the position that Ueshima at col. 3, lines 38-41 indicates that CTI device or other device generates the password. However, claim 10 recites “The method of claim 1, further comprising utilizing a network node to generate the unique

credential”. However, the password discussed at the cited portion of Ueshima cannot be equated with the unique credential of claim 10 at least because the password of Ueshima is not generated after receiving a common user credential from the user. Claim 10 is allowable for at least this additional reason.

Claim 12 recites “the network specific information comprises network generated information that is unique to a connection in use by the user.” The Office takes the position that the password generated by Schneider is generated in accordance with a phone number and, therefore, meets this limitation. However, telephone numbers are not necessarily unique to a user and, claim 12 is allowable for at least this additional reason.

Claim 13 recites “the network specific information comprises information that is unique to a physical location of the user.” The Office takes the position that Ueshima teaches registering the address of the user at col. 13, lines 9-11. However, this disclosure of Ueshima is discussing user information that may be registered. Registration of user information is distinct from “generating a unique credential after receiving the common user credential from the user, the unique credential comprising network specific information associated with a connection of the user” where the network specific information is unique to a physical location of the user.

With respect to claim 14, the Applicants respectfully disagree that there exists a motivation to substitute the conventional phone system of Ueshima with another network such as cable, Internet, Ethernet, or PPPoE as suggested by the Office through taking Official Notice. Simple substitution of the connection of one of these network connections in place of the telephone connection of Ueshima would lead to a non-working system. For example, part of Ueshima cited by the Office describes that the user placed a call to the CTI system. If an PPPoE connection was substituted for the telephone connection, it would not be possible to place a call. Claim 14 recites “an interface operable to receive an authentication request from a PPPoE client of a given user”. As discussed, substitution of a PPPoE client for the telephone system of Ueshima would lead to a non-working system. Claim 14 is allowable for at least this additional reason.

Claims 15-24 are allowable, at least by virtue of their dependence from claim 14. In addition, claims 15-24 recite additional elements not disclosed or suggested by the cited portions of Ueshima and Schneider taken together with the Official Notice.

For example, without debating the Office's position regarding taking Official Notice that ADSL is a well-known transmission technique, the Applicants respectfully disagree that there exists a motivation to use an ADSL connection in place of the telephone connection of Ueshima. Simple substitution of an ADSL connection in place of the telephone connection of Ueshima would lead to a non-working system. For example, part of Ueshima cited by the Office describes that the user placed a call to the CTI system. If an ADSL connection was substituted for the telephone connection, it would not be possible to place a call. Claim 22 recites the network specific information comprises a unique circuit identification number associated with an ADSL connection. Claim 22 is allowable for at least this additional reason.

Claim 25 is allowable. The Office takes the position that claim 25 is substantially the same as claims 1-14. The Applicants respectfully submit that claim 25 recites a separate combination not taught or suggested by the combination of Ueshima and Schneider in combination with any of the various Official Notice taken by the Office. In particular, claim 25 recites "A computer-readable medium having computer-readable data to receive a request for access to an information network, the request comprising a credential; to replace the credential with a network generated credential that uniquely identifies a connection in use by a user seeking access to the information network; to compare the network generated credential against a stored collection of acceptable credentials; and, to issue a permit response if the network generated credential is acceptable" (emphasis added.)

Nothing in the combination, as cited by the Office, teaches or suggests receiving a request including a credential and replacing the credential with a network generated credential identifying a connection in use by a user. In sharp contrast, the Office, at page 5 of the Office action, suggests including the telephone number as part of a certificate – not replacing it. See Office Action at page 5 stating: "It would have been obvious to include the phone number as part of the certificate. The motivation to do so would have been to provide a more comprehensive set of authentication parameters and information relating to the permitted

connection setup, by using a certificate including all said information, rather than the password alone.” (Emphasis added.) This is in stark contrast to replacing the credential as recited by claim 25.

Thus, claim 25 is allowable.

Claim 26 is allowable, at least by virtue of its dependence from claim 25. In addition, claim 26 recites additional elements not disclosed or suggested by the cited portions of Ueshima and Schneider and further by the Official Notice.

CONCLUSION

Applicants have pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicants respectfully request reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

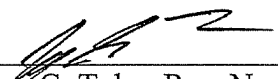
Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date



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